

**THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	
<b>PATRICIA M. HALSEY</b>	:	
	:	<b>Bk. No. 19-11696</b>
<b>Debtor</b>	:	<b>Chapter No. 13</b>
	:	
<b>US BANK NATIONAL ASSOCIATION.</b>	:	
<b>Movant</b>	:	<b>11 U.S.C. §362</b>
<b>v.</b>	:	
<b>PATRICIA M. HALSEY</b>	:	
	:	
<b>Respondent</b>	:	

**RESPONSE TO MOTION OF US BANK NATIONAL ASSOCIATION FOR RELIEF FROM  
AUTOMATIC STAY UNDER §362 PURSUANT TO BANKRUPTCY PROCEDURE RULE 4001**

Respondent, PATRICIA M. HALSEY, by her attorney, GARY E. THOMPSON, ESQ., hereby responds to Movant's Motion for Relief as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. Strict proof is demanded at time of hearing.
5. Admitted.
6. Admitted.
7. Denied. Strict proof is demanded at time of hearing.
8. Denied. The allegations contained herein are conclusions of law to which no response is required.
9. Denied. The allegations contained herein are conclusions of law to which no response is required.
10. Denied. The allegations contained herein are conclusions of law to which no response is required.
11. Denied. The allegations contained herein are conclusions of law to which no response is required.

WHEREFORE, Respondent respectfully requests that this Court deny Movant's Motion for Relief.

Dated: September 3, 2019

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**GARY E. THOMPSON, ESQ.**  
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